

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
Plaintiff

v.

RENE BORROEL-LOPEZ,  
Defendant.

NO. CR17-322 RAJ

PROTECTIVE ORDER

This matter having come before the Court on a Stipulated Motion for Entry of a  
Discovery Protective Order, the Court hereby enters the following:

**DISCOVERY PROTECTIVE ORDER**

**A. Definitions**

As used in this Order, the term “Protected Information” means any contents or  
data extracted from the cellular telephone seized by DEA from Ronnie Cruickshank (RC)  
on December 11, 2017, *except for* communications between RC and either (1) the  
undercover DEA task force officer involved in this matter, or (2) any of the numbers RC  
identified to law enforcement as belonging to his source of supply (as detailed at  
RBL\_000071, paragraph 3), which the government alleges to be Rene Borroel-Lopez..

1 As used in this Order, the term “Protected Material” means any document or other  
2 record containing or reflecting Protected Information.

3 **B. Procedures**

4 Possession of Protected Information and/or Protected Material is hereby limited to  
5 the attorneys of record in the above captioned case and their investigators and agents. The  
6 attorneys of record and their investigators and agents may not provide Protected  
7 Information and/or Protected Material to the defendant, nor review Protected Information  
8 and/or Protected Material with the defendant, without either the agreement of the United  
9 States Attorney’s Office for the Western District of Washington, or an Order of the  
10 Court.

11 The attorneys of record and their investigators and agents may review or discuss  
12 the contents of documents containing Protected Material with any prospective witness, as  
13 long as the attorneys of record and investigators and agents do not share the unredacted  
14 documents, or share any Protected Information of victims or witnesses, with any  
15 prospective witness, unless an agreement is reached with the United States Attorney’s  
16 Office for the Western District of Washington, or otherwise by an Order of the Court.

17 If any Protected Information or Protected Material is filed in court or otherwise  
18 disseminated as part of litigation, the parties agree to redact such information prior to  
19 filing; unless, based on a party’s application prior to filing, the Court finds that an  
20 unredacted filing is necessary and appropriate.

21 For redactions, numbers that constitute Protected Information shall be redacted to  
22 the last 2-4 digits and names shall be redacted to initials, or otherwise as needed to  
23 comply with applicable federal and local rules.

24 The attorneys of record and their investigators and agents shall keep any Protected  
25 Material secured whenever the Protected Material is not being used in furtherance of their  
26 work in the above-captioned case.

27 All documents containing Protected Material shall be returned to the  
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1 United States, or destroyed, once all charges are resolved by dismissal or by final  
2 conviction.

3 The parties agree that this Protective Order may be modified, as necessary, by  
4 filing with the Court a Stipulated Order Modifying the Protective Order, or by other order  
5 of the Court.

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7 DATED this 28th day of February, 2018.

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10 The Honorable Richard A. Jones  
11 United States District Judge  
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